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July 15, 2021

By ECF

Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Brown v. P.C. Richard & Son, LLC
No. 1:21-cv-04781-LJL

Dear Judge Liman:

We represent defendant P.C. Richard & Son, LLC ("P.C. Richard") in the referenced matter. With the consent of plaintiff's counsel, we write to respectfully request a further extension to August 23, 2021 of the deadline by which P.C. Richard must answer, move or otherwise respond to the Complaint. We request this extension to facilitate ongoing settlement discussions.

In support of this request, we state that: (1) the original deadline to respond was June 24, 2021; (2) this is the second request for an extension of this deadline (Dkt. 6); (3) the Court granted the previous request to extend this deadline to July 23, 2021 (Dkt. 7); (4) plaintiff's counsel has consented to the extension requested herein; and (5) the parties' next scheduled appearance before the Court is the Initial Pretrial Conference on August 3, 2021, at 11:00 a.m. (Dkt. 8). We respectfully submit that good cause exists for a further extension of this deadline, which will afford the parties sufficient time to fully explore settlement without incurring potentially unnecessary litigation expense.

In light of the above, we respectfully request that the Court extend to August 23, 2021 P.C. Richard's time to respond to the Complaint.

Respectfully submitted,

/s/ William S. Gyves

William S. Gyves

cc: All counsel of record (via ECF)